

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
FILED

NOV 24 1999

ROBERT H. WHELMWELL, CLERK
BY _____ DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE - OPELOUSAS DIVISION

JOEL A. MORVANT, SR., MONICA * CIVIL ACTION NO. CV 99-1427 L-O
MORVANT, JOEL A. MORVANT, JR. *
AND RIDGE M. MORVANT *

VERSUS * JUDGE SHAW
*

L&L SANDBLASTING, INC. and *
CXY ENERGY, INC. * MAGISTRATE METHVIN

MAY CALL WITNESS LIST

L&L Sandblasting, Inc., who in compliance with the Court's November 8, 1999
Scheduling Conference Order, respectfully submits that it may call the following witnesses
at trial:

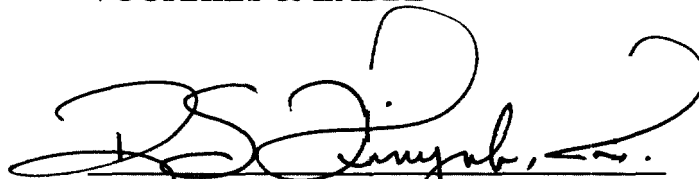
1. Joel A. Morvant, Sr.
Fact witness to testify to the events immediately prior to, at the time of, and
following the alleged incident, operations in general, experience, and roles and
responsibilities of respective parties;
2. Monica Morvant
Fact witness to testify to the events immediately prior to, at the time of, and
following the alleged incident, operations in general, experience, and roles and
responsibilities of respective parties;
3. David Stephens, or other representative of L&L Sandblasting, Inc.
Fact witness to testify to the events immediately prior to, at the time of, and
following the alleged incident, operations in general, experience, and roles and
responsibilities of respective parties;
4. Doug Otten, or other representative of CXY Energy, Inc.
Fact witness to testify to the events immediately prior to, at the time of, and
following the alleged incident, operations in general, experience, and roles and
responsibilities of respective parties;

5. Representative of C&D Specialists Company, Inc.
Fact witness to testify to the events immediately prior to, at the time of, and following the alleged incident, operations in general, experience, and roles and responsibilities of respective parties;
6. Michael Estillette, foreman
Fact witness to testify to the events immediately prior to, at the time of, and following the alleged incident, operations in general, experience, and roles and responsibilities of respective parties;
7. James Fuselier, blaster/painter
Fact witness to testify to the events immediately prior to, at the time of, and following the alleged incident, operations in general, experience, and roles and responsibilities of respective parties;
8. Wade Moorhead, blaster/painter
Fact witness to testify to the events immediately prior to, at the time of, and following the alleged incident, operations in general, experience, and roles and responsibilities of respective parties;
9. John E. Cobb, M.D.
Medical expert to testify as to facts and opinions concerning medical aspects of plaintiff's alleged injury, treatment, and resulting disability, if any;
10. Joseph Comeaux, M.D.
Medical expert to testify as to facts and opinions concerning medical aspects of plaintiff's alleged injury, treatment, and resulting disability, if any;
11. Donald Bryant, D.C.
Medical expert to testify as to facts and opinions concerning medical aspects of plaintiff's alleged injury, treatment, and resulting disability, if any;
12. Douglas Bernard, M.D.
Medical expert to testify as to facts and opinions concerning medical aspects of plaintiff's alleged injury, treatment, and resulting disability, if any;
13. Liability expert to be named at a later date;
14. Economic expert to be named at a later date;
15. Vocational rehabilitation expert to be named at a later date;

16. Any witness whose testimony may be necessary or appropriate for purposes of impeachment, rebuttal, and/or completeness of the record;
17. Any witness listed by any other party to this litigation; and
18. L&L Sandblasting, Inc. expressly reserves the right to supplement and amend this list as and when more information becomes available.

Respectfully submitted,

VOORHIES & LABBÉ



ROBERT S. HINYUB, JR. (#24457)

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Lafayette, LA 70502-3527

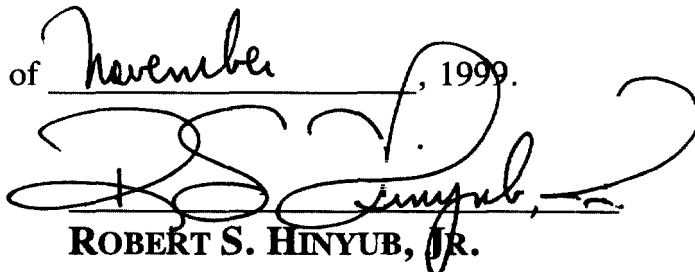
Phone: (318) 232-9700

**Counsel for L&L SANDBLASTING,
INC.**

C E R T I F I C A T E

I HEREBY CERTIFY that a copy of the above and foregoing has this day been forwarded to all known counsel of record by depositing same in the United States mail, postage prepaid and properly addressed.

Lafayette, Louisiana this 23rd day of November, 1999.



ROBERT S. HINYUB, JR.